

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRIAN DOUGLAS,

Plaintiff,

v.

MARTIN F. HORN, et al.,

Defendants

Civil Action No. 1:CV-00-0982

(Judge Rambo)

33
1/30/01
mjs

FILED
HARRISBURG

JAN 29 2001

MARY E. D'ANDREA, CLERK
Per
DEPUTY CLERK

DECLARATION OF BEN LIVINGOOD

I, Ben Livingood, hereby declare under penalty of perjury that the following statements are true and correct based upon my personal knowledge and belief:

1. I am presently employed by the Pennsylvania Department of Corrections as Assistant to the Superintendent at the State Correctional Institution at Camp Hill ("SCI-Camp Hill"). I have held that position since August, 1995.

2. As Assistant to the Superintendent, one of my titles is that of Grievance Coordinator. As the Grievance Coordinator, I receive and process inmate grievances filed pursuant to the Consolidated Inmate Grievance Review System under Department Policy DC-ADM 804.

3. According to institutional records, inmate Brian Douglas, DP-1285, has been confined to SCI-Camp Hill since April 9, 1998. During that time period, I have had an opportunity to receive and process inmate grievances filed by inmate Brian Douglas.

4. According to my records, he filed a total of seven inmate grievances since his admission. Of those total grievances filed, only four were appealed to final review under DC-ADM 804. A true and correct copy of a list of the grievances which Mr. Douglas has filed with

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CHIEF COUNSEL

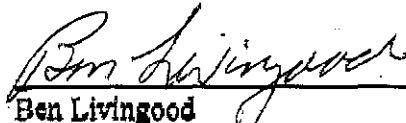
SCI-CAM

003

my office since his admission to SCI-Camp Hill and their final disposition is attached hereto and marked Exhibit "A."

5. Those grievances, which were appealed to final review by Douglas, are: CAM-0178-00, CAM-212-00, CAM-0267-00, and CAM-0697-99. Inmate grievance CAM-0178-00 was filed against Business Manager Robert Gimble and concerned a request for indigent legal material. Inmate grievance CAM-0212-00 concerned the denial of paralegal assistance and accused librarian Zhong of discrimination. Inmate grievance CAM-0267-00 dealt with medical issues. Inmate grievance CAM-0697-99 concerned his removal from the sex offender program and alleged that he was disabled.

Executed this 27th day
of January, 2001


Ben Livingood
Assistant to the Superintendent
SCI-Camp Hill

01/22/2001

Inmate Grievance Tracking System
Grievances for DP1285 - 04/09/1998 thru 01/22/2001

Grievance Number	Inmate Name	Date Gr. Received	Grievance Category	Housing Unit	Grievance Location
CAM-0178-2000	DOUGLAS, BRIAN	03/14/2000	Legal/Courts	N	
CAM-0212-2000	DOUGLAS, BRIAN	03/27/2000	Legal/Courts	N	
Count 2 CAM-0267-2000	DOUGLAS, BRIAN	04/21/2000	Medical	N	DISPENSARY
Count 1 CAM-0187-2000	DOUGLAS, BRIAN	03/17/2000	Miscellaneous	N	N
CAM-0719-2000	DOUGLAS, BRIAN	11/30/2000	Miscellaneous	P	P
Count 2 CAM-0697-1999	DOUGLAS, BRIAN	10/05/1999	Programs	N	
Count 1 CAM-0694-1999	DOUGLAS, BRIAN	10/04/1999	Work	N	KITCHEN 2
Count 1					

EXHIBIT

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(Judge Rambo)


CERTIFICATE OF SERVICE

I hereby certify that I am this day depositing in the U.S. mail a true and correct copy of the foregoing Declaration of Ben Livingood upon the person(s) and in the manner indicated below.

Service by first-class mail
addressed as follows:

Brian Douglas, DP-1285
SCI-Camp Hill
P.O. Box 200
Camp Hill, PA 17001-0200

James D. Young, Esquire
Lavery, Faherty, Young & Patterson, P.C.
301 Market Street
Harrisburg, PA 17108-1245


Janelle C. Porr
Clerk Typist 2

PA Department of Corrections
Office of Chief Counsel
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444

Dated: January 29, 2001